

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARJAY VANCEAH,

Plaintiff,

-against-

NATIONAL RAILROAD PASSENGER
CORPORATION d/b/a AMTRAK and TIMOTHY
DENTY,

Defendants.

Civil Action No. 18-cv-09418 (ER)

NOTICE OF MOTION FOR DISCOVERY SANCTIONS

PLEASE TAKE NOTICE that upon the accompanying Declaration of Kelly C. Spina, including all the exhibits annexed thereto, and the Memorandum of Law in Support of Defendant National Railroad Passenger Corporation d/b/a Amtrak's ("Amtrak") Motion for Discovery Sanctions and upon all prior pleadings and proceedings, Amtrak, will move this Court, before the Honorable Edgardo Ramos, United States District Judge, Southern District of New York, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, Courtroom 619, New York, New York, on a date and time to be determined by the Court, pursuant to Rules and 37 of the Federal Rules of Civil Procedure, 28 U.S.C. § 1927, and/or the Court's inherent power, as against Plaintiff Marjay Vanceah, her counsel, Rene Myatt, Esq., and her law firm, the Law Office of Rene Myatt, for an order and judgment (i) dismissing all of Plaintiff's claims with prejudice, (ii) awarding fees and costs; and (iii) such other and further relief as the Court deems just, proper, and equitable.

Date: November 23, 2021
Melville, New York

/s/ Kelly C. Spina

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